



Dr Mechthild Rössler, Director of Heritage Division and Director of the World Heritage Centre, via email

Mr Edmond Moukala, Chief of Africa Unit, World Heritage Centre

Dear Ms Rössler and Mr Moukala,

We hope this letter finds you well and wish you all the best for the upcoming 40th Session of the UNESCO World Heritage Committee in Istanbul.

We are writing to you today concerning the very serious threat posed by the rubber plantation of Sud Cameroon Hévéa SA (Sudcam), a subsidiary of GMG Global Ltd. currently in the process of being acquired by Halcyon Agri, to the Outstanding Universal Value (OUV) of Cameroon's Dja Wildlife Reserve.ⁱ

We warmly welcome your draft decision to inscribe the Dja Reserve on the List of World Heritage in Danger at your 40th Session in Istanbul 10-20 July and believe this decision is long overdue.ⁱⁱ It is indeed scandalous that construction of the Mékin hydroelectric dam on the periphery of the Dja is nearing completion "without any mitigating measures being taken to diminish the negative impacts" on the OUV and in the total absence of civil society oversight and media attention.ⁱⁱⁱ The risk of increased poaching from the project "resulting in a worrying decrease in the numbers of large mammals, in particular the elephant" is real.^{iv}

We are concerned however by the language contained in your draft decision regarding the Sudcam rubber plantation. The rubber plantation of Sud Cameroon Hévéa SA (Sudcam), a subsidiary of GMG Global Ltd. currently in the process of being acquired by Halcyon Agri is nothing less than a serious threat to the Outstanding Universal Value (OUV) of Cameroon's Dja Wildlife Reserve.^v

Although the Committee expresses "concern" about "the perspectives of an extension of activities by the Sud Cameroon Hévéa Society [sic] with the demographic increase which might result" it does not consider the plantation an "ascertained danger" according to paragraph 180 of the World Heritage Operational Guidelines.^{vi}

In the attachment to this letter, you will find the results of an analysis of satellite images from January 2011 to April 2016 indicating that since 2011 Sudcam has clear-cut 5,930 ha of forest within up to 300 meters of the Dja's western border. This likely underestimate's Sudcam's total deforestation as it only covers a portion of the company's acreage.

It is hard to conceive how Sudcam's clear-cutting of forests could not satisfy Paragraph 180's third criterion of "ascertained danger": "Human encroachment on boundaries or in upstream areas which threaten the integrity of the property."

According to a forthcoming report, residents of neighboring communities have stated that Sudcam did not acquire land according to a Free and Prior Informed Consent (FPIC) process.^{vii} Moreover, Sudcam employees admitted to destroying camps of Baka indigenous peoples.^{viii}

We are not aware that the decrees awarding Sudcam's provisional and definitive concessions were ever published.^{ix} From the newly published joint UNESCO/IUCN 2015 mission report we learn that in 2014 Sudcam received a temporary 30,000 ha concession near Djoum and that award of a 13,000 ha permanent



concession there is expected for 2017.^x Furthermore, GMG refers to the 45,198 ha zone Sudcam was awarded in April 2013 as a freehold concession.^{xi} Our understanding is that Cameroonian law does not provide for freehold allotment of national lands to foreign companies.^{xii}

As you may be aware, the Sudcam plantation is located only kilometers from President Paul Biya's Mvomeka'a mansion and security compound. In a paper published last year the Center for International Forestry Research (CIFOR) alleged that 20 percent of Sudcam's capital is "apparently" owned by "an influential member of the Cameroonian political elite, whose identity we do not know."^{xiii} This leads us to wonder whether political interference by "influential" political elites is allowing the Sudcam project to flourish despite its questionable legality, detrimental impact on the Dja Reserve and surrounding forests.

We noted with great interest your committee's decision 36 COM 7B.1, demanding the suspension of Geovic Mining's operations until the company completed a social and environmental impact assessment in conformity with international standards. We believe this stands as a solid precedent to demand similar actions in the case of Sudcam given the shockingly poor quality of its social and environmental impact assessment.^{xiv} We strongly urge your Committee to adopt more robust corrective measures that address the human encroachment and deforestation features of Sudcam's operation.

This includes:

- Demanding the suspension of Sudcam's activities barring the completion of a social and environmental impact assessment compliant with international standards;
- Declaring the Sudcam plantation an ascertained danger to the Dja World Heritage Site;
- Demanding the immediate publication of all documents related to Sudcam's land acquisition as well as its common commitments (*cahiers de charges*), agreements and memoranda of understanding with neighboring communities;
- Investigating allegations concerning the violation of the rights of local communities;
- Publishing information related to Sudcam's influential Cameroonian shareholders and ascertaining whether or not political interference by said shareholders is undermining enforcement of Cameroon's laws and UNESCO's World Heritage Operational Guidelines as pertains to the Sudcam project.

We wish you all the very best for your important meeting in Istanbul. Our colleague Andrey Petrov will be attending the meeting and please do feel free to let him know directly if you have questions during your proceedings.

Thank you for your attention.

Lagi Toribau

Program Director (Interim)

Greenpeace Africa

lagi.toribau@greenpeace.org



cc:

Office of the President of Cameroon

MINFOF

Delegation of the European Union

Sudcam

CIRAD

IUCN

World Bank

Africa Wildlife Foundation

i

GMG's natural rubber operations, including Sudcam, are currently in the process of acquisitioning by Halcyon Agri, in which GMGs former parent company Sinochem will obtain a 30.07 percent stake, <http://www.halcyonagri.com/news/asset-acquisitions-1-hac-mgo-2-gmg-vgo-and-3-nr-assets-acquisition-update-to-the-pre-conditions/>

ii

UNESCO, WHC/16/40.COM/7B, 27 May 2016, <http://whc.unesco.org/en/documents/141503>

iii

Ibid.

iv

Ibid.

v

GMG's natural rubber operations, including Sudcam, are currently in the process of acquisitioning by Halcyon Agri, in which GMGs former parent company Sinochem will obtain a 30.07 percent stake, <http://www.halcyonagri.com/news/asset-acquisitions-1-hac-mgo-2-gmg-vgo-and-3-nr-assets-acquisition-update-to-the-pre-conditions/>

vi

UNESCO, « Operational Guidelines for the Implementation of the World Heritage Convention, » <http://whc.unesco.org/archive/opguide12-en.pdf>

vii

Forthcoming report by NGOs, 2015.

viii

Ibid

ix

Décret N°2013/089 du 19 avril 2013 portant attribution en concession définitive à la Société SUD HEVEA CAMEROUN S.A. de deux (02) dépendances du domaine national sises dans les Arrondissements de Meyomessala, Meyomessi et Djoum, Département du Dja et Lobo.

Décret n° 2008/248 du 24 juillet 2008 portant attribution en concession provisoire à la Société SUD CAMEROUN HEVEA S.A. d'une dépendance du domaine national de 8200 ha, sise au lieu-dit "Meyomessala", Arrondissement de Meyomessale, Département du Dja et Lobo.

Décret n° 2008/380 du 14 novembre 2008 portant attribution en concession provisoire à la Société SUD CAMEROUN HEVEA S.A. d'une dépendance du domaine national de 36998 ha 86 a 55 ca, sise au lieu-dit "Meyomessala", Arrondissement de Meyomessale, Département du Dja et Lobo.

x

Youssouph DIEDHIOU (IUCN), Bandiougou DIAWARA (UNESCO), RAPPORT DE MISSION DE SUIVI REACTIF CONJOINTE UNESCO/UICN A LA RESERVE DE FAUNE DU DJA, 28 November -- 5 December 2015, <http://whc.unesco.org/en/list/407/documents/>

xi

GMG Global Ltd, Annual Report 2013, <http://gmglimitedcompany.com/misc/ar2013.pdf>, p.122.

xii

Decree No. 76-166 of 17 April 1976 to establish the terms and conditions of management of national lands. See §1 and §10(3).

xiii

Samuel Assembe-Mvondo, Louis Putzel, Richard Eba'a Atyi, "Socioecological responsibility and Chinese overseas investments The case of rubber plantation expansion in Cameroon," CIFOR Working Paper no. 176, 2015, http://www.cifor.org/publications/pdf_files/WPapers/WP176CIFOR.pdf

xiv

The impact assessment contains numerous falsehoods. See for example the "Alternatives" section (pp 68-70), which includes the farcical claim that Sudcam's rubber plantation will play "the environmental role of a forest." (Our translation). ETUDE D'IMPACT ENVIRONNEMENTAL DU PROJET DE CREATION D'UNE PLANTATION AGROINDUSTRIELLE D'HEVEA DANS LE DJA ET LOBO, REGION DU SUD. Enviro Consulting Sarl. January 2011 ; Yaoundé.